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Attorneys for Defendant
UCBH HOLDINGS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DANIEL NYGAARD, WENDY FONG, and
JAMES ELAM, on Behalf of Themselves and
All Others Similarly Situated,

Plaintiffs,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,
CRAIG S. ON, and EBRAHIM SHABUDIN,

Defendants.

Case No. CV 09-4505 VRW

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT**

1 WHEREAS, Plaintiffs commenced this Action by filing a complaint dated September 24,
2 2009 (the "Complaint");

3 WHEREAS, the Complaint asserts claims under sections 10(b) and 20(a) of the Securities
4 Exchange Act of 1934 on behalf of a purported class;

5 WHEREAS, there have been five other complaints (listed below) filed since September
6 11, 2009, involving substantially the same claims and overlapping parties, and those actions are
7 pending in the United States District Courts for the Northern District of California:

- 8 • *Zhu v. UCHB Holdings, Inc. et al* (3:09-cv-04208-JSW), filed September 11, 2009;
- 9 • *Tran v. UCBH Holdings, Inc. et al* (3:09-cv-04429-JSW), filed September 21, 2009;
- 10 • *Waterford v. UCBH Holdings, Inc. et al* (3:09-cv-04449-MHP), filed September 22,
11 2009;
- 12 • *Perez v. UCBH Holdings, Inc. et al* (3:09-cv-04492-JSW), filed September 23, 2009;
- 13 and
- 14 • *Durbin v. UCBH Holdings, Inc. et al* (3:09-cv-04513-JSW), filed September 24, 2009;

15 WHEREAS, motions to consolidate these actions into a single action and to appoint a lead
16 plaintiff are expected to be filed;

17 WHEREAS, the parties understand that the lead plaintiff in these actions will file a
18 consolidated complaint;

19 WHEREAS, the parties agree that defendants UCBH Holdings, Inc., Thomas S. Wu,
20 Craig S. On, and Ebrahim Shabudin (collectively the "Defendants") should respond to the
21 consolidated complaint filed by lead plaintiff and not to the individual complaints; and

22 WHEREAS, the parties have agreed to a schedule that extends Defendants' time to
23 respond to the Complaint until after a consolidated complaint has been filed.

24 IT IS HEREBY STIPULATED AND AGREED among the undersigned parties as
25 follows:

26 1. Defendants shall not be required to answer or otherwise respond to the complaint
27 in this action; and
28

2. Defendants shall answer or otherwise respond to a consolidated complaint on a schedule to be agreed upon with the lead plaintiff, or set by the Court.

SO STIPULATED.

Dated: October 13, 2009

JORDAN ETH
ANNA ERICKSON WHITE
CRAIG D. MARTIN
MORRISON & FOERSTER LLP

By: /s/ Anna Erickson White
Anna Erickson White

Attorneys for Defendant
UCBH HOLDINGS, INC.

Dated: October 13, 2009

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Attorney for Defendant Thomas Wu

Dated: October 13, 2009

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Attorney for Defendant Craig On

1 Dated: October 13, 2009

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2 By: /s/ James A. Lassart
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3 Attorney for Defendant Ebrahim Shabudin

4 Dated: October 13, 2009

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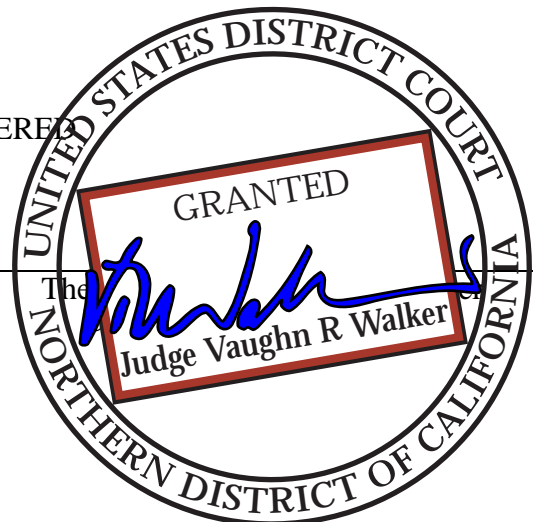
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11 By: /s/ Robert S. Green
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12 Attorneys for Plaintiffs

13 PURSUANT TO STIPULATION, IT IS SO ORDERED

14 Dated: Oct. 21, 2009



1 I, Anna Erickson White, am the ECF User whose ID and password are being used to file
2 this Stipulation and [Proposed] Order Extending Time to Respond to Complaint. In compliance
3 with General Order 45, X.B., I hereby attest that Timothy P. Crudo, Nanci Clarence, James A.
4 Lassart, and Robert S. Green have concurred in this filing.

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6 By: /s/ Anna Erickson White
Anna Erickson White
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